

JP:AEL

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

MWARAMI KIMBENGLE,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

Gregory Stemkowski, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about June 23, 2012, within the Eastern District of New York and elsewhere, defendant MWARAMI KIMBENGLE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. On or about June 23, 2012, MWARAMI KIMBENGEELE arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Turkish Airlines Flight No. 826 from Istanbul, Turkey.

2. Defendant MWARAMI KIMBENGEELE was selected for a Customs and Border Protection ("CBP") examination. He presented a Dikaite bag and a Targus bag for inspection. The defendant admitted ownership of the bags and their contents. Upon examination, the CBP officer noticed that the bottom of the Dikaite bag felt unusually thick. A probe of this bag revealed a package concealed within the liner of the bag, which contained a brown, powdery substance that field-tested positive for the presence of heroin.

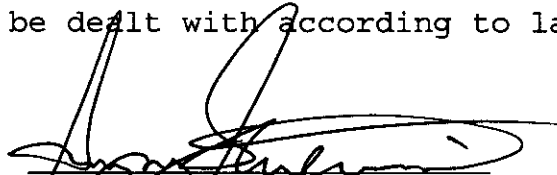
3. The Targus bag was also examined, and a Toshiba laptop was discovered. Further examination of the laptop revealed a package concealed inside which contained a brown, powdery substance that field-tested positive for the presence of heroin. The defendant was placed under arrest.

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

4. The total approximate gross weight of the heroin found in defendant MWARAMI KIMBENGEELE'S bags is 1,671 grams.

WHEREFORE, your deponent respectfully requests that defendant MWARAMI KIMBENGEELE be dealt with according to law.



GREGORY STEMKOWSKI  
Special Agent  
HSI

Sworn to before me this  
25th day of June, 2012

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GE  
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